

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

| | | |
|-------------------------------------|---|------------------------------------|
| EARL PARRIS, JR., individually, |) | |
| and on behalf of a Class of persons |) | |
| similarly situated, |) | |
| |) | |
| <i>Plaintiff,</i> |) | Civil Action No. 4:21-cv-00040-TWT |
| |) | |
| vs |) | |
| |) | |
| 3M COMPANY, et al., |) | |
| |) | |
| <i>Defendants.</i> |) | |

DEFENDANT MOUNT VERNON MILLS, INC.’S
CONSENT MOTION FOR EXTENSION OF TIME

Defendant Mount Vernon Mills, Inc. (“Mount Vernon”) respectfully requests an extension of time through and including February 23, 2023 to respond to Plaintiff Earl Parris Jr. and Intervenor-Plaintiff City of Summerville’s (collectively, “Plaintiffs”) Joint Motion to Compel [**Doc. 328**]. Mount Vernon states as follows in support of this Motion:

1. On February 2, 2023 Plaintiffs filed a Joint Motion to Compel discovery responses against Mount Vernon [Doc. 328 (“Plaintiffs’ Motion”)].
2. Pursuant to Local Rule 7.1, Mount Vernon’s response to the Plaintiffs’ Motion is due Thursday, February 16, 2023. That deadline has not passed.

3. Mount Vernon has conferred with counsel for Plaintiffs, who consent to a one-week extension of time for Mount Vernon to respond to the Plaintiffs' Motion, through and including, February 23, 2023.

4. Mount Vernon is requesting this extension in good faith and not for purposes of delay.

5. For the Court's convenience, a proposed order is attached hereto as Exhibit A.

For the foregoing reasons, Mount Vernon requests an extension of time to respond to Plaintiffs' Joint Motion to Compel through and including February 23, 2023.

This the 15th day of February, 2023.

/s/ William M. Droze
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the within and foregoing DEFENDANT MOUNT VERNON MILLS, INC.'S CONSENT MOTION FOR EXTENSION OF TIME was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This the 15th day of February, 2023.

/s/ William M. Droze

William M. Droze

Georgia Bar No. 231039

william.droze@troutman.com

Attorney for Defendant Mount Vernon Mills, Inc.

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